



WMUB
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May 28, 2004

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: MM Docket No. 99-325

Dear Ms. Dortch:

WMUB Public Radio, licensed to the President and Trustees of Miami University, supports the incorporation of Secondary Audio Channel (SAC) technology into the forthcoming FCC standards for digital broadcasting on FM channels. We believe that this new technology will assist us in providing greater access to radio for citizens in our listening area.

HD Radio's improved sound quality is an important factor in our decision to begin digital broadcasting. However, the capability to serve supplemental audio programming ("multiplexing") provides a very important capacity to provide additional services to listeners. We believe the SAC is congruent with our public service mission and would enable us to meet listener needs that are either underserved or not served at all.

It is possible that the SAC could mean providing our main programming on the primary channel, and an additional service such as music programming on the supplemental channel. The SAC would furnish a very cost-effective means of expanding the quality and quantity of local, diverse programming thereby improving our overall

offerings to the community we serve.

In authorizing the use of the SAC with HD Radio technology, the FCC's goals will be well served by providing non-commercial educational stations with maximum flexibility to serve the needs and interests of our listeners. Public radio stations share a mission to serve the public's educational needs and have a proven track record of successfully doing so. Public radio counts on the FCC to fully protect our ability to serve that programming mission.

Public radio stations also need to generate revenue to fund our activities. The potential use of SAC technology for remunerative purposes will strengthen our ability to continue to serve the public better into the future.

We therefore urge the FCC to incorporate the Secondary Audio Channel into the final regulations implementing HD Radio.

Thank you for your consideration.

Sincerely,

Cleve Callison
General Manager
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